

# **EXHIBIT 4**

**From:** [Machleidt, Dario](#)  
**To:** [Paige Stradley](#); [ValveKTSservice](#)  
**Cc:** [RothschildMGTeam](#)  
**Subject:** RE: Valve v. Rothschild  
**Date:** Thursday, May 22, 2025 12:07:15 PM

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Paige, please also send us your 30(b)(6) topics as soon as you can. That'll help with depo scheduling. Thank you.

Dario Machleidt  
[dmachleidt@ktslaw.com](mailto:dmachleidt@ktslaw.com)  
Kilpatrick Townsend & Stockton LLP  
1420 Fifth Avenue | Suite 3700 | Seattle, WA 98101  
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**From:** Machleidt, Dario  
**Sent:** Thursday, May 22, 2025 9:44 AM  
**To:** Paige Stradley <[PStradley@MerchantGould.com](mailto:PStradley@MerchantGould.com)>; ValveKTSservice <[ValveKTSservice@kilpatricktownsend.com](mailto:ValveKTSservice@kilpatricktownsend.com)>  
**Cc:** RothschildMGTeam <[RothschildMGTeam@MerchantGould.com](mailto:RothschildMGTeam@MerchantGould.com)>  
**Subject:** RE: Valve v. Rothschild

Paige,

We're working with the client to get you availability dates. Your proposal regarding Meyler makes sense and we will consider it and get back to you. Let's add preliminary depo scheduling to tomorrow's meet and confer to see if we can streamline both team's efforts in the coming weeks. Thank you.

Sincerely,

Dario Machleidt  
[dmachleidt@ktslaw.com](mailto:dmachleidt@ktslaw.com)  
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**From:** Paige Stradley <[PStradley@MerchantGould.com](mailto:PStradley@MerchantGould.com)>  
**Sent:** Thursday, May 22, 2025 8:59 AM  
**To:** ValveKTSservice <[ValveKTSservice@kilpatricktownsend.com](mailto:ValveKTSservice@kilpatricktownsend.com)>  
**Cc:** RothschildMGTeam <[RothschildMGTeam@MerchantGould.com](mailto:RothschildMGTeam@MerchantGould.com)>  
**Subject:** Valve v. Rothschild

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**\*\*CAUTION: External Email\*\***

Kate,

On our April 30<sup>th</sup> meet and confer, both parties discussed checking on the availability of witnesses for depositions. Mr. Meyler is available on June 19<sup>th</sup>, and we are working on the availability of the

other three individuals you mentioned on that call (Mr. Rothschild, Mr. Falcucci, and Ms. Arias). However, given the limited role that Mr. Meyler and his law firm have played in connection with the claims at issue and for efficiency purposes, we believe it would be appropriate to take Mr. Meyler's individual deposition on the same day as his 30(b)(6) deposition. If Valve is open to combining the depositions, we could speak with Mr. Meyler about making himself available for more than seven hours. Please let us know Valve's position on this.

Valve has not provided the availability of any of the individuals Valve identified on its initial disclosures as we requested. In light of M&G's motion to withdraw, we wanted to check to see if Valve wanted to postpone the scheduling of these depositions or if Valve wished to continue with the scheduling of these depositions. If the latter, please provide availability for those individuals on Valve's initial disclosures in June.

Thank you,

Paige

**Paige Stradley**

she/her/hers

Partner

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